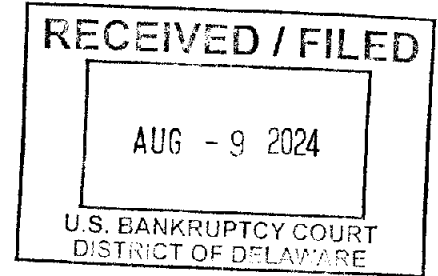


UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
Case No. 21-cv-20862-BLOOM/Otazo-Reyes

MILLENNIUM FUNDING, INC., et al. }  
Plaintiffs, }  
 }  
vs. }  
 }  
1701 MANAGEMENT, LLC et al. }  
Defendants, }  
 }



**DEFENDANT'S MOTION TO INFORM, NOTICE OF CREDITORS' BANKRUPTCY**

1. Now comes Muszynski, "Defendant" and makes Motion To Inform And Notice Of Creditors' Bankruptcy to fulfill another affirmative duty willfully abandoned by the alleged "movie company" Creditors and their undenied business partner and representative, Kerry Culpepper ("Culpepper"). Culpepper, while cognizant of his affirmative duty to inform the Court of his partners' bankruptcy, willfully refuses to do so in hopes of illicitly continuing collection activities in multiple courts, again.

2. Culpepper again lies by omission and conceals facts from the S.D. FL Court, this time attempting to hide: a) the Chapter 11 bankruptcy filed 29 June 2024 by entities with whom he represents and partners, b) the Chapter 11 conversion to Chapter 7 on 10 July 2024, c) transfer of ownership, appeal rights, and collection rights to the D.DE Bankruptcy estate and Trustee, and d) Culpepper's illegitimate, contemptuous collection actions. See *In re: Frontier Communications Corporation, et al.*, S.D.N.Y., Case No. #20-22476-mg, Culpepper's "Notice Of Bankruptcy", Doc. #2392, and *In re: Redbox Entertainment, LLC*, D.DE Bankruptcy Court, Case No. #24-11457, the court's "Order Converting Cases From Chapter 11 to Chapter 7 Of The Bankruptcy Code And Granting Related Relief", Doc. #5; Exhibits 1 and 2, respectively.

3. Debtor filed bankruptcy 11 May 2023, determined by two trustees an asset-less case and listed alleged "movie companies" as creditors, represented by their undenied partners, Culpepper and Joel Rothman ("Rothman"). Culpepper and Rothman undeniably are financed by and participate in a fee-splitting partnership with the concealed litigant and non-lawyer, PML Process Management Limited ("PML") located in the Republic of Cyprus which launders foreign dark-money the U.S. lawyers use to sue on behalf of alleged "movie companies" using fraudulent copyright claims rented from non-performing entities ("NPE") to extort then split profits (payoffs) with PML 70% / 30% (as shown on the record, PML's partnership retains 70%). Culpepper admits PML's primacy and has never denied the arrangement.

4. In BAP Case No. #23-23, Doc. #1148362, and despite extraordinary and illicit efforts to conceal PML and obfuscate his partnership's racketeering, Culpepper's own statements evidence their sham and PML's primacy in it (PML's presence remains concealed from the S.D. FL since inception):

*"Muszynski seeks to punish PML for petitioning the S. D. Flo. to put a stop to his Liquid VPN service..."*

Not "Millennium", "Voltage", "Screen Media Ventures ("SMV"), or any of 36 other partners; PML.

5. While hiding PML and omitting it from filings, Culpepper "joined" the partnership's entities as (alleged) "movie company Creditors", including his alter egos 42 Ventures, LLC, CulpepperIP, LLLC. And PML, whom Culpepper admits was and is *the principal litigant* and an undenied fee-splitting partner and funder. Before underlying litigation commenced in 2021 in S.D.FL, Culpepper included SMV and its owner of more than 10% of equity, "Chicken Soup For The Soul Entertainment, Inc." ("CSFTSE") as partners in litigation. Despite constant shifting and restructuring of entities, names, and ownerships to conceal interests and PML's primacy among related entities (another badge of fraud), SMV remained present. A tiny sample of Culpepper's filings shows SMV's and CSFTSE's (therefore PML's joint position) long-term involvement and evidence Culpepper's contempt in the instant matter:

- a. "Application of Kerry Culpepper To Appear Pro Hac Vice", Doc. #10, p.2, includes SMV;
- b. "Final Default Judgment", Doc. #17-A, p. 4, includes SMV;
- c. "Application and Order To Appear Pro Hac Vice", Doc. #97, p.3, includes SMV;
- d. "Motion Of Millennium Funding, Inc. Et Al. To Intervene As Appellee", Doc. #001148362, p.2, in BAP Case #23-23, includes SMV;
- e. "Statement Regarding Interested Parties 1st Cir. BAP L.R. 8010-1(b)(4)", Doc. #001148362, ¶3, in BAP Case #23-23, includes SMV and Chicken Soup For The Soul, Inc.;
- f. "Creditors' Objection To Debtor's Motion For Leave To Appeal Interlocutory Order", Doc. #001148365, p.2, in BAP Case #23-23, includes SMV;
- g. "Notice Of Appearance", Doc. #001148374, p.2, BAP Case #23-23, includes SMV and PML.

6. Culpepper's "Statement Of Joinder In Motion For (A) Relief From The Automatic Stay And (B) Injunctive Relief Pursuant To 11 U.S.C. §105(A)", Doc. #23, p.1, E.D.TX, Case #23-90112, included his appearance with SMV and dozens of other alleged "movie company clients" before being admitted, see Doc. #17, p.12, signature block includes SMV. Culpepper continues to conceal undenied pecuniary interest coupled with representation of his fee-splitting, funding partner, PML. In part, these interests motivate Culpepper's joinder of the partnership's interests and obvious vexation.

7. Despite Culpepper's concealment of his partner/clients' Chapter 11 filing **29 June 2024**, he included SMV and CSFTSE in filings for weeks after the automatic stay was effective and after earlier providing another court proper notice. Culpepper willfully refuses to provide required notices of bankruptcy to D.PR for Case No. #23-02870, the BAP for Cases Nos. #24-11 and #24-14, the S.D.FL for

Case No. #21-20862, and SKN for Case No. #NEVHCV2022/0183; *four courts and five cases* willfully denied notices of bankruptcy while filings continued as though nothing had changed, a few of which are:

- a. “Motion Of Millennium Funding, Inc., Et Al. To Intervene As Appellee”, Doc. #1149520, p.2, at the BAP, Case #24-11, but Culpepper made no other notices filing therein on **1 July 2024**;
- b. “Notice Of Cross-Appeal And Statement Of Election”, Doc. #212, p.2, D.PR on **1 July 2024**;
- c. “Notice Of Cross-Appeal And Statement Of Election”, Doc. #216, p.2, D.PR on **1 July 2024**;
- d. “Motion Of Millennium Funding, Inc., Et Al. To Intervene As Appellee”, Doc. #1149520, p.2, at the BAP, Case #24-11, filed by Culpepper without any other notice therein on **2 July 2024**;
- e. “Cross-Appellants’ Designation Of Additional Items To Be Included In The Record And Statement Of Issues To Be Presented On The Cross-Appeal”, Doc. #224, in D.PR, Case #23-02870, filed therein by Culpepper and without any other notices to the D.PR, on **7 July 2024**;

8. Given Culpepper’s long-term partnership, representation, principal involvement in an eight-figure collections matter, and prior notice to another court, how is it possible Culpepper did not know of SMV’s and CFSTSE’s eminent, much less pending bankruptcy? Their Form 204 lists thirty (30) creditors, three (3) with claims exceed the \$15 Million Culpepper continues collections for in the U.S. and SKN. Twenty-seven (27) claims are less than Culpepper’s “judgment”, a proportion impossible to overlook.

9. Without notices, Culpepper continues willfully, contemptuously filing fraudulent collection actions, and now omits SMV and CSFTSE without explanation to continue concealing their status.

10. Culpepper’s “Objection To Debtor’s Motion For Stay”, Doc. #1149611, p.2, BAP Case No. #24-11, willfully omitted SMV and CSFTSE despite Culpepper prior filing on **14 July 2024**, a Notice Of Bankruptcy in S.D.N.Y., (which omitted notice of conversion to Chapter 7 four days earlier).

11. Culpepper willfully refuses to notice that his partner/clients’ Chapter 11 converted to a Chapter 7 on 10 July 2024, see Doc. #5, Case No. #24-11457, D.DE; Exhibit 2.

12. Culpepper willfully concealed by omission, important facts from the BAP because upon his joined partners’ bankruptcy, their claims became property of the bankruptcy estate and Trustee George Miller. Upon discovering Culpepper’s latest lies of omission, Debtor spoke with Trustee Miller Friday, 27 July 2024 at 3:09 p.m. for several minutes. Trustee Miller confirmed the Culpepper’s partners’ property belongs to the estate, that he holds authority over the interests, that it is improper for third parties to engage in collections, and that doing so violates the automatic stay.

13. Culpepper admits to dozens of continuing violations of Debtor’s automatic stay stretching to 12 May 2023. Trustee Miller had keen interest in the instant matter and requested copies of related filings.

14. Culpepper, an undenied copyright troll and pettifogger, must employ ambush litigation, proven fabrications, admitted procedural and ethical failures, and repeated lies of omission because the facts ventilate his positions. His obvious contempt for the bankruptcy process and other courts insults not only

Congress' supposed intent to provide legitimate creditors and debtors prompt resolutions but the BAP's dignity when he cheats and "plays cute".

15. Accordingly, since an 'officer of the court' will not honor his oath, it again falls to Debtor to inform the S.D. FL of Culpepper's partner/client bankruptcies in an appeal in which he has yet to be admitted, on behalf of the Appellees and Cross-Appellants because they refuse to admit the rights therein have belonged to the Bankruptcy Trustee since 29 June 2024 in the Delaware bankruptcy proceedings.

**CERTIFICATE OF SERVICE**

The undersigned respectfully submits this filing and further certifies it was served on the parties and entities named in the case by way of the Court's CM/ECF system and/or email subsequent to its mailing on the date below to the S.D. FL Clerk of Court for inclusion in the record as required as of the date indicated in this submission and certification below.

29 July 2024

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Charles Muszynski", is written over a horizontal line.

Charles Muszynski, pro se  
[usfilefolder@protonmail.com](mailto:usfilefolder@protonmail.com)

P. O. Box 1423

Basseterre

St. Kitts and Nevis

West Indies

**EXHIBIT 1**

**In re: Frontier Communications Corporation, et al.**

**S.D.N.Y., Case No. #20-22476-mg**

**NOTICE OF BANKRUPTCY**

**Doc. #2392, 12 July 2024**

**EXHIBIT 2**

***In re: Chicken Soup For The Soul Entertainment, Inc., et al.***

**D.DE Bankruptcy Court Case No. 24-11442 (TMH)**

**ORDER CONVERTING CASES FROM CHAPTER 11 TO CHAPTER 7 OF  
THE BANKRUPTCY CODE AND GRANTING RELATED RELIEF**

**Doc. #5, 10 July 2024**